

Charles Robinson  
March 23, 2005

1           A.    I sat with them long enough basically to  
2   understand what was going on.

3           Q.    So you felt you had sufficient  
4   knowledge --

5                       MR. FRAGOMENI:  Objection.

6           Q.    (By Mr. Springer)  -- to be able --

7           A.    To understand the process.

8           Q.    And to provide them guidance, isn't that  
9   so?

10          A.    In most instances yes.

11          Q.    I am -- we had talked about Ruth Linda  
12   Rober before, Do you remember that?

13          A.    Yes.

14          Q.    And when did you begin your friendship  
15   with her?

16          A.    I don't recall.

17          Q.    Do you recall the year?

18          A.    No, I don't.

19          Q.    Do you recall how it started?

20          A.    No, I don't.

21          Q.    Did you have an e-mail correspondence  
22   with her?

23          A.    Yes, I did.

24          Q.    And when did that start?

Charles Robinson  
March 23, 2005

1 A. I don't recall.

2 Q. Do you recall the year?

3 A. No.

4 Q. Okay. Do you remember the content of any  
5 of the e-mails?

6 A. No, I don't.

7 Q. Do you remember the contents of any of  
8 her e-mails?

9 A. No, I don't.

10 Q. Were they at all sexual in nature?

11 A. Never.

12 Q. Did you have a sexual relationship with  
13 her?

14 A. Yes, I did.

15 Q. Was she married?

16 A. Yes.

17 Q. How long did the sexual relationship  
18 last?

19 A. I don't recall.

20 Q. You don't recall how long it lasted?

21 A. Nope.

22 Q. Did she break it off?

23 A. Yes.

24 Q. Do you remember when that occurred?

Charles Robinson  
March 23, 2005

1 A. No, I don't.

2 Q. And I am sorry -- did you tell me that  
3 she was married?

4 A. Yes.

5 Q. Did you save any of the e-mails?

6 A. No, I didn't.

7 Q. Do you have any notes or letters from  
8 her?

9 A. Not that I recall, no.

10 Q. Why did she terminate the relationship?

11 A. I really don't remember.

12 Q. What was your reaction?

13 A. Like anybody -- you know, I was  
14 disappointed.

15 Q. Did she ever complain to you of  
16 harassment?

17 A. No -- not that I recall, no.

18 Q. Did she ever tell to cease sending her  
19 e-mails or any other activity?

20 A. No, not that I recall, no.

21 Q. Okay.

22 MR. SPRINGER: (Hanging.)

23 (C. Robinson Exhibit No. 4, 3-Page

24 Document Entitled General Case, marked

Charles Robinson  
March 23, 2005

1 for identification.)

2 Q. (By Mr. Springer) I'm showing you  
3 something that has been produced in this lawsuit and  
4 what I'd like to do is -- I note the date of the  
5 occurrence is 9/7/200. Was Ruth Linda Rober working  
6 in NMC at that time?

7 A. No.

8 Q. Do you know where she was working?

9 A. Not really, no.

10 Q. Well, do you know if she was working --  
11 do you know the -- she was working at Verizon; is  
12 that correct?

13 A. Yes.

14 Q. Okay. If you turn to the last  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Charles Robinson  
March 23, 2005

1 page, Page 3 of this --

2 A. Okay. Yup.

3 Q. It says that Ms. Rober is reporting that  
4 she is being harassed via company e-mail system by  
5 an associate by the name of Charles Robinson; did  
6 she -- having read this, do you remember her  
7 speaking to you whatsoever about your e-mails to  
8 her?

9 A. No, I don't.

10 Q. Did she ever just tell you cut it out,  
11 Charlie?

12 A. I don't really remember.

13 Q. It says here: Then Ms. Rober told  
14 Security she had made several attempts to reason  
15 with Mr. Robinson to no avail.

16 Do you remember any conversations with  
17 her with regard to her telling you that she didn't  
18 want to have any relationship with you and you  
19 should stop e-mailing her?

20 A. I don't recall anything.

21 Q. Do you ever remember her saying that you  
22 should stop bothering her?

23 A. I can't -- I don't recall.

24 Q. Okay. Were you aware that Mr. Pilat was

Charles Robinson  
March 23, 2005

1       aware of this security investigation?

2             A.    No, I was not.

3             Q.    Do you remember Mr. Pilat talking to you  
4       about this?

5             A.    Clarify that for me, will you?

6             Q.    Do you remember Mr. Pilat talking to you  
7       about either your relationship with Ruth Linda Rober  
8       or this security investigation?

9             A.    He never spoke to me about any of that.

10            Q.    Really? Well, did he talk to you about  
11       any of your activity on the e-mail system?

12            A.    He never spoke to me about that.

13            Q.    Okay. Did you have any problems with  
14       Mr. Rober's -- Ms. Rober's sister, who was Sue  
15       Rober?

16            A.    No.

17            Q.    Okay. Did you try at any point to talk  
18       to Sue Rober about your relationship with Ruth  
19       Linda?

20            A.    Not that I recall, no.

21            Q.    Didn't you speak to Sue Rober and try to  
22       get her to intercede with her sister?

23            A.    I don't really recall.

24            Q.    After this, do you remember being told by

Charles Robinson  
March 23, 2005

1 Security that if you continued e-mailing her, it  
2 could be considered stalking?

3 A. Yes.

4 Q. And did you agree to cease all  
5 communication with Ms. Rober?

6 A. Yes.

7 Q. Did you, in fact, cease all communication  
8 with Ms. Rober after this incident?

9 A. Yes.

10 Q. And again, you don't remember anything  
11 that Ms. Rober said to you about your e-mails  
12 whatsoever?

13 A. No I don't.

14 Q. Nor do you remember any other content of  
15 them?

16 A. No I don't.

17 Q. Nor do you have any of them in your  
18 position?

19 A. No, I don't.

20 Q. Now, do you remember trying to contact  
21 Ruth Linda through Sue Rober?

22 A. No, I don't.

23 Q. How long did the sexual relationship with  
24 Ruth Linda Rober go on?

Charles Robinson  
March 23, 2005

1 MR. FRAGOMENI: Objection.  
2 THE WITNESS: I really don't know.  
3 MR. FRAGOMENI: You asked that  
4 question and he answered it already.  
5 Q. (By Mr. Springer) Do you remember a  
6 Tricia Chisholm?  
7 A. Yes.  
8 Q. Did she work for you?  
9 A. Nope.  
10 Q. Did you know of her work?  
11 A. Same as everybody else, yes.  
12 Q. Was she a service tech?  
13 A. Service rep, yes.  
14 Q. She was a service rep in NMC?  
15 A. That's correct.  
16 Q. And was she a service rep from the time  
17 you got there or did she come in at some point, do  
18 you remember?  
19 A. May have come in afterwards.  
20 Q. Okay. Was she a good worker?  
21 A. To the best of my knowledge, yes.  
22 Q. Okay. But she never worked for you; is  
23 that correct?  
24 A. That's correct.